FILED

JUL 12 2016

PATRICK KEANEY
Clerk, U.S. District Court
By ____________
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, AMBER RENE CLAPHAN, DONALD WAYNE TRAMMEL JR., SAMANTHA LEE SMITH, TERESA CHAGOLLA, JACOB HORTON MASTERS JR., NATHAN ROWDEN GREEN, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE, JIMMY W. SEQUICHIE JR., REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL, FREDERIC PETERSEN BECK JR., GARY WAYNE WILDER, BRENDA ALLEN AIRINGTON, BRYAN STEVEN LAFAVOR, THERESA JO DAVIS, LATISHA DAWN ARNOLD, and SHEENA CHANDEL MEIKLE,

Defendants.

Case No. CR-16-13-RAW

SEALED

SECOND

S U P E R S E D I N G I N D I C T M E N T

The Federal Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. The McClendon Drug Trafficking Organization (McClendon DTO) was comprised of Defendants **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, AMBER RENE CLAPHAN, DONALD WAYNE TRAMMEL JR., SAMANTHA LEE SMITH, TERESA CHAGOLLA, JACOB HORTON MASTERS JR.,**

NATHAN ROWDEN GREEN, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE, JIMMY W. SEQUICHIE JR., REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL, FREDERIC PETERSEN BECK JR., GARY WAYNE WILDER, BRENDA ALLEN AIRINGTON, BRYAN STEVEN LAFAVOR, THERESA JO DAVIS, LATISHA DAWN ARNOLD, SHEENA CHANDEL MEIKLE, and others known and unknown to the Grand Jury, who acted interdependently as co-conspirators in operating the McClendon DTO to distribute drugs for profit as will be described in more detail below.

2. **CODY LEE McCLENDON III, a/k/a Cody-Mac,** is a leader within the McClendon DTO which is involved in the distribution of methamphetamine within the Eastern District of Oklahoma and elsewhere. **CODY LEE McCLENDON III, a/k/a Cody-Mac,** was incarcerated in the Oklahoma State Penitentiary, McAlester, Oklahoma, from September 26, 2008, until January 27, 2016. Beginning in or about the end of 2013 and continuing until on or about January 27, 2016, **CODY LEE McCLENDON III, a/k/a Cody-Mac,** utilized cellular telephones illegally smuggled into the prison to coordinate the acquisition and distribution of methamphetamine within the Eastern District of Oklahoma and elsewhere.

3. **MICHAEL DAVID LINCOLN, a/k/a Linc,** is a leader within the McClendon DTO. **MICHAEL DAVID LINCOLN, a/k/a Linc,** was incarcerated in the Oklahoma State Penitentiary, McAlester, Oklahoma, from October 10, 2006, until January 27, 2016. While incarcerated, **MICHAEL DAVID LINCOLN, a/k/a Linc,** utilized cellular telephones illegally smuggled into the prison to coordinate the acquisition and distribution of methamphetamine within the Eastern District of Oklahoma and elsewhere.

4. **CODY LEE McCLENDON III, a/k/a Cody-Mac,** and **MICHAEL DAVID LINCOLN, a/k/a Linc,** are members of the Indian Brother Hood (IBH). The IBH is a Prison Gang whose members are primarily of Native American descent and which operates within and outside the Oklahoma Department of Corrections. The IBH has a defined structure as set out in a written set of by-laws which provides expectations and commands which must be followed for every IBH member. These by-laws describe the powers, duties, and expectations of the IBH hierarchy which includes a Chief, High Council, Tribes, War Chiefs, and Warriors. A Chief holds the highest rank within the IBH. The High Council consists of 5 "patched" members whose orders must be followed by other IBH members. The IBH consists of numerous individual Tribes who are each controlled by a War Chief. The War Chief, with certain limitations, makes command decisions concerning actions to be taken by his Tribe. Warriors are soldiers within IBH who have no rank and who must carry out, without question, all orders given by higher ranking IBH members. The IBH utilizes this structure to coordinate the distribution of controlled substances, collection of monies owed for controlled substances, and the protection by force, if necessary, of other IBH members and their drug trafficking interests within and outside the Oklahoma Department of Corrections.

5. **CODY LEE McCLENDON III, a/k/a Cody-Mac,** and **MICHAEL DAVID LINCOLN, a/k/a Linc,** are IBH War Chiefs and utilize their membership and associations within the IBH to contact other IBH members and associates to assist in the distribution of methamphetamine and other associated drug trafficking activities within the Eastern District of Oklahoma and elsewhere.

6. **AMBER RENE CLAPHAN** is a methamphetamine distributor and drug and money courier for the McClendon DTO.

7. **DONALD WAYNE TRAMMEL JR.** is a methamphetamine distributor and maintains large amounts of currency and methamphetamine for the organization.

8. **SAMANTHA LEE SMITH** is a methamphetamine distributor and drug and money courier for the organization and also maintains large amounts of currency and methamphetamine for the McClendon DTO.

9. **TERESA CHAGOLLA** is a methamphetamine distributor and maintains a residence where methamphetamine and currency are kept for the McClendon DTO.

10. **JACOB HORTON MASTERS JR.** is a methamphetamine distributor who also maintained currency for the McClendon DTO.

11. **NATHAN ROWDEN GREEN** is a methamphetamine distributor and drug and money courier for the McClendon DTO.

12. **DUSTY ALLEN DRYWATER** is a methamphetamine distributor and drug courier for the McClendon DTO.

13. **ASHLEY NOEL STEELE** is a methamphetamine distributor and drug courier for the McClendon DTO.

14. **JIMMY W. SEQUICHIE JR.** is an enforcer who threatens or commits acts of violence to assist in the collection of drug debts for the McClendon DTO and receives methamphetamine in return for his services.

15. **REGINA ANN BALLARD,** a/k/a Regina Hummingbird, is a methamphetamine distributor and drug courier for the McClendon DTO.

16. **MATILDA KAY BIRDTAIL** is a methamphetamine distributor and drug courier for the McClendon DTO.

17. **FREDERIC PETERSEN BECK JR.** is a methamphetamine distributor and drug courier for the McClendon DTO.

18. **GARY WAYNE WILDER** is a methamphetamine distributor and drug courier for the McClendon DTO.

19. **BRENDA ALLEN AIRINGTON** is a methamphetamine distributor who maintained a storage unit from which she concealed and stored methamphetamine for eventual distribution.

20. **BRYAN STEVEN LAFAVOR** is a methamphetamine distributor and drug courier for the McClendon DTO.

21. **THERESA JO DAVIS,** is the mother of **MICHAEL DAVID LINCOLN, a/k/a Linc**, and receives, deposits, conceals and disburses drug proceeds in the form of United States currency.

22. **LATISHA DAWN ARNOLD** is a methamphetamine distributor and drug courier for the organization.

23. **SHEENA CHANDEL MEIKLE** is a methamphetamine distributor and drug courier for the organization.

COUNT ONE

DRUG CONSPIRACY
[21 U.S.C. § 846 & 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)]

Beginning in or about the end of 2013, the exact date being unknown to the Grand Jury, and continuing until on or about January 27, 2016, within the Eastern District of Oklahoma and

elsewhere, the Defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, AMBER RENE CLAPHAN, DONALD WAYNE TRAMMEL JR., SAMANTHA LEE SMITH, TERESA CHAGOLLA, JACOB HORTON MASTERS JR., NATHAN ROWDEN GREEN, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE, JIMMY W. SEQUICHIE JR., REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL, FREDERIC PETERSEN BECK JR., GARY WAYNE WILDER, BRENDA ALLEN AIRINGTON, BRYAN STEVEN LAFAVOR, THERESA JO DAVIS, LATISHA DAWN ARNOLD, and SHEENA CHANDEL MEIKLE** did knowingly and intentionally conspire, confederate and agree with each other, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 21, United States Code, Section 846, as follows:

OBJECTS OF THE CONSPIRACY

The objects of the conspiracy were:

1. **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, AMBER RENE CLAPHAN, DONALD WAYNE TRAMMEL JR., SAMANTHA LEE SMITH, TERESA CHAGOLLA, JACOB HORTON MASTERS JR., NATHAN ROWDEN GREEN, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE, REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL, FREDERIC PETERSEN BECK JR., GARY WAYNE WILDER, BRENDA ALLEN AIRINGTON, BRYAN STEVEN LAFAVOR, THERESA JO DAVIS, LATISHA DAWN ARNOLD, and SHEENA CHANDEL MEIKLE** conspired to possess with intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of

methamphetamine and 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

2. **JIMMY W. SEQUICHIE JR.** conspired to possess with intent to distribute and to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

The objects of the conspiracy were to be accomplished and were accomplished by the following manner and means:

1. The defendants coordinated and orchestrated the transportation of methamphetamine from source locations in Oklahoma City and Tulsa, Oklahoma, and elsewhere to the Eastern District of Oklahoma and elsewhere.

2. The defendants maintained and established locations within the Eastern District of Oklahoma for the purpose of distributing, storing, and selling methamphetamine.

3. The defendants used telephones, cellular and otherwise, and social media to conduct and carry out the organization's objectives.

4. The defendants, and others known and unknown to the Grand Jury, communicated each with the other, and with others known and unknown to the Grand Jury, to apprise each other and others of events and circumstances that could or would endanger or reveal the existence of the drug enterprise to law enforcement authorities.

5. Throughout the period of the conspiracy, **CODY LEE McCLENDON III, a/k/a Cody-Mac**, advised, directed, and supervised the other members of the conspiracy through the use

of contraband telephones he obtained while housed within the Oklahoma State Penitentiary, McAlester, Oklahoma.

6. The defendants discussed with co-conspirators the cause and concern for various law enforcement actions affecting individual members of the drug organization.

7. The defendants used text messaging devices at times to convey information to assist in drug related transactions and to communicate each with the other.

8. Throughout the course of the conspiracy, various members of the conspiracy updated each other and questioned, planned, and orchestrated responses to law enforcement activity in a manner designed to hide assets, profits, drugs and assist other co-conspirators from apprehension and detection and to further the existence of the conspiracy.

9. **CODY LEE McCLENDON III, a/k/a Cody-Mac,** would post bond and hire attorneys for members of the conspiracy who had been arrested on charges related to their drug trafficking activity associated with the McClendon DTO. This was done to insure coconspirators would not cooperate with law enforcement authorities and to insure members of the conspiracy remained loyal to the drug organization.

10. It was part of the conspiracy and understood that individual conspirators could contact their own sources, cultivate their own customers and otherwise act alone when they desired, but although there were periodic arguments and disagreements, the conspirators, with knowledge and support for each other's unlawful distribution activities, each at some time during the course of the conspiracy, knowingly and intentionally agreed and acted together jointly with other conspirators to advance the common overall goal of buying and selling methamphetamine for profit.

COUNT TWO

CONTINUING CRIMINAL ENTERPRISE
[21 U.S.C. §§ 848(a), 848(b), 848(c), 848(d) & 848(s)]

Beginning in or about the end of 2013, the exact date being unknown to the Grand Jury, and continuing until on or about January 27, 2016, in the Eastern District of Oklahoma and elsewhere, the defendant, **CODY LEE McCLENDON III, a/k/a Cody-Mac,** did knowingly engage in a continuing series of felony violations of Title 21, United States Code, Sections 841, 843, and 846, which violations constitute a Continuing Criminal Enterprise, which violations involved at least 1 kilogram of methamphetamine (actual) or at least 10 kilograms of a mixture or substance containing a detectable amount of methamphetamine, which violations were knowingly and intentionally undertaken by **CODY LEE McCLENDON III, a/k/a Cody-Mac,** in concert with five or more other persons with respect to whom **CODY LEE McCLENDON III, a/k/a Cody-Mac,** occupied a position of organizer, a supervisory position, and any other position of management, and from which **CODY LEE McCLENDON III, a/k/a Cody-Mac,** obtained substantial income and resources, all of which is in violation of Title 21, United States Code, Sections 848(a), 848(b), 848(c), 848(d) and 848(s).

COUNT THREE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) & 18 U.S.C. § 2]

On or about November 20, 2014, within the Eastern District of Oklahoma, the defendant, **CODY LEE McCLENDON III, a/k/a Cody-Mac**, and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about October 21, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, GARY WAYNE WILDER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIVE

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about October 28, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DUSTY ALLEN DRYWATER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT SIX

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about November 6, 2015, within the Eastern District of Oklahoma, the defendant, **CODY LEE McCLENDON III, a/k/a Cody-Mac**, and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT SEVEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about November 27, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, BRYAN STEVEN LAFAVOR,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT EIGHT

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about December 1, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DUSTY ALLEN DRYWATER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT NINE

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about December 3, 2015, within the Eastern District of Oklahoma, the defendant, **CODY LEE McCLENDON III, a/k/a Cody-Mac**, and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TEN

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) & 18 U.S.C. § 2]

On or about December 4, 2015, within the Eastern District of Oklahoma, the defendant, **CODY LEE McCLENDON III, a/k/a Cody-Mac**, and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT ELEVEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about December 11, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, JACOB HORTON MASTERS JR.**, and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TWELVE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) & 18 U.S.C. § 2]

On or about December 12, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about December 13, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DONALD WAYNE TRAMMEL JR.**, and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about December 13, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DONALD WAYNE TRAMMEL JR., REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) & 18 U.S.C. § 2]

On or about December 14, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, DONALD WAYNE TRAMMEL JR., NATHAN ROWDEN GREEN,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNTS SIXTEEN THROUGH THIRTY-FIVE

USE OF A COMMUNICATION DEVICE IN FURTHERANCE OF DRUG TRAFFICKING [21 U.S.C. § 843(b)]

On the dates set forth below, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, DONALD WAYNE TRAMMEL JR., JACOB HORTON MASTERS JR., DUSTY ALLEN DRYWATER, JIMMY W. SEQUICHIE JR., FREDERIC PETERSEN BECK JR.,** and others known to the Grand Jury, knowingly and intentionally, and unlawfully used a communication facility, that is: telephones (cellular or otherwise), in committing, causing and facilitating acts constituting felonies under Title 21, United States Code, Sections 841 and 846, in that the Defendants used the telephones to discuss various matters concerning conspiracy, distribution of methamphetamine and possession with intent to distribute methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 843(b) as set forth in the table below:

COUNT	DATE	TARGET TELEPHONE #	SESSION #	DRUG INVOLVED	DEFENDANT(S)
16	11/24/15	(918) 931-1428	155, 160	Methamphetamine	Cody Lee McClendon III & Donald Wayne Trammel Jr.
17	11/25/15	(918) 931-1428	60	Methamphetamine	Cody Lee McClendon III
18	11/25/15	(918) 931-1428	512	Methamphetamine	Cody Lee McClendon III & Donald Wayne Trammel Jr.

COUNT	DATE	TARGET TELEPHONE #	SESSION #	DRUG INVOLVED	DEFENDANT(S)
19	11/29/15	(918) 931-1428	1996, 2008	Methamphetamine	Cody Lee McClendon III & Michael David Lincoln
20	11/30/15	(918) 931-1428	2537	Methamphetamine	Cody Lee McClendon III
21	12/1/15	(918) 931-1428	2909	Methamphetamine	Cody Lee McClendon III
22	12/1/15	(918) 931-1428	2987, 2989, 2990, 2991, 2992	Methamphetamine	Cody Lee McClendon III & Michael David Lincoln
23	12/3/15	(918) 931-1428	4145	Methamphetamine	Cody Lee McClendon III & Michael David Lincoln
24	12/3/15	(918) 931-1428	4173	Methamphetamine	Cody Lee McClendon III
25	12/4/15	(918) 931-1428	4386	Methamphetamine	Cody Lee McClendon III
26	12/4/15	(918) 931-1428	4525	Methamphetamine	Cody Lee McClendon III & Jacob Horton Masters, Jr.
27	12/5/15	(918) 931-1428	5024	Methamphetamine	Cody Lee McClendon III
28	12/6/15	(918) 931-1428	5761	Methamphetamine	Cody Lee McClendon III & Donald Wayne Trammel Jr.
29	12/6/15	(918) 351-9356	5738	Methamphetamine	Cody Lee McClendon III & Jacob Horton Masters, Jr.
30	12/11/15	(918) 351-9356	8466	Methamphetamine	Cody Lee McClendon III & Jacob Horton Masters, Jr.
31	12/13/15	(918) 351-9356	10377	Methamphetamine	Cody Lee McClendon III &

COUNT	DATE	TARGET TELEPHONE #	SESSION #	DRUG INVOLVED	DEFENDANT(S)
					Donald Wayne Trammel Jr.
32	12/13/15	(918) 351-9356	10267	Methamphetamine	Cody Lee McClendon III & Donald Wayne Trammel Jr.
33	11/25/15	(918) 931-1428	631	Methamphetamine	Cody Lee McClendon III, Dusty Allen Drywater, & Jimmy W. Sequichie Jr.
34	11/28/15	(918) 931-1428	1859	Methamphetamine	Cody Lee McClendon III & Frederic Peterson Beck, Jr.
35	12/9/15	(918) 931-1428	7562	Methamphetamine	Cody Lee McClendon III & Frederic Peterson Beck, Jr.

All in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTY-SIX

FELON IN POSSESSION OF FIREARM
[18 U.S.C. §§ 922(g)(1) & 924(a)(2) & 2]

On or about November 25, 2015, within the Eastern District of Oklahoma, the defendants, **DUSTY ALLEN DRYWATER** and **JIMMY W. SEQUICHIE JR.**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, a firearm, to-wit: One (1) Glock Model 23 .40 caliber semi-automatic pistol imported by Glock Inc Smyrna, GA bearing serial number AFU822US, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 2.

COUNT THIRTY-SEVEN

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)]

On or about October 27, 2015, within the Eastern District of Oklahoma, the defendant, **REGINA ANN BALLARD, a/k/a Regina Hummingbird**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-EIGHT

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about December 23, 2015, within the Eastern District of Oklahoma, the defendant, **FREDERIC PETERSEN BECK JR.**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT THIRTY-NINE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about September 25, 2015, within the Eastern District of Oklahoma, the defendant, **GARY WAYNE WILDER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FORTY

DISTRIBUTION OF METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) & 18 U.S.C. § 2]

On or about October 23, 2015, within the Eastern District of Oklahoma, the defendant, **GARY WAYNE WILDER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FORTY-ONE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B) & 18 U.S.C. § 2]

On or about November 12, 2015, within the Eastern District of Oklahoma, the defendant, **GARY WAYNE WILDER,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FORTY-TWO

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) & 18 U.S.C. § 2]

On or about December 9, 2015, within the Eastern District of Oklahoma, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, BRENDA ALLEN AIRINGTON,** and persons known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FORTY-THREE

MONEY LAUNDERING CONSPIRACY
[18 U.S.C. § 1956(h)]

Beginning in or about December of 2013, the exact date being unknown to the Grand Jury, and continuing until in or about April 2016, the exact dates being unknown to the Grand Jury, in the Eastern District of Oklahoma and elsewhere, the defendant, **THERESA JO DAVIS,** did willfully and knowingly combine, conspire, confederate, and agree together with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(h), as follows:

OBJECT OF THE CONSPIRACY

To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, deposited large sums of United States Currency into the City National Bank bank account of **THERESA JO DAVIS**, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

DRUG FORFEITURE
[21 U.S.C § 853]

Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Forty-Two above, the defendants, **CODY LEE McCLENDON III, a/k/a Cody-Mac, MICHAEL DAVID LINCOLN, a/k/a Linc, AMBER RENE CLAPHAN, DONALD WAYNE TRAMMEL JR., SAMANTHA LEE SMITH, TERESA CHAGOLLA, JACOB HORTON MASTERS JR., NATHAN ROWDEN GREEN, DUSTY ALLEN DRYWATER, ASHLEY NOEL STEELE, JIMMY W. SEQUICHIE JR., REGINA ANN BALLARD, a/k/a Regina Hummingbird, MATILDA KAY BIRDTAIL, FREDERIC PETERSEN BECK JR., GARY WAYNE WILDER, BRENDA ALLEN AIRINGTON, BRYAN STEVEN LAFAVOR, THERESA JO DAVIS, LATISHA DAWN ARNOLD, and SHEENA CHANDEL MEIKLE** shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting, or derived from, the proceeds obtained directly, or indirectly, as a result of the said violation(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation(s), including but not limited to a

Money Judgment representing the amount of proceeds obtained as a result of the offenses alleged in Counts One through Forty-Two above.

A TRUE BILL

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY

MARK F. GREEN
United States Attorney

SHANNON L. HENSON, OBA #15905
Assistant United States Attorney